

UNITED STATES OF AMERICA
Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)
) **FCC Docket 99-25**
Creation of a Low Power Radio Service)

SUPPLEMENTAL WRITTEN COMMENTS
OF THE AMHERST ALLIANCE

THE AMHERST ALLIANCE is a Net-based, nationwide citizens' advocacy group for media reform in general and Low Power Radio in particular. The organization, though headquartered in Michigan today, was founded on September 17, 1998 at a meeting in Amherst, Massachusetts.

In its June 14, 2005 Written Comments in FCC Docket 99-25, THE AMHERST ALLIANCE reiterated that it advocates -- among a number of other public policy goals -- establishment of LP250 stations, on the FM Band, in areas where the population density is very low.

In a filing of August 1, 2005, Amherst's June 14 recommendations, including the call for licensing of LP250 stations in truly rural areas, were endorsed by 161 parties, led by THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN, THE LPAM NETWORK of Maine, TUNE TRACKER SYSTEMS of Wisconsin and RAND ADVERTISING of Maine. The 161 parties included within their Written Comments the full, re-submitted text of Amherst's June 14 Written Comments.

THE AMHERST ALLIANCE now has additional information to present on the matter of LP250 stations.

This information is one result of demographic research that Amherst conducted while helping to prepare a 5-party Petition For Rulemaking to establish a commercial Low Power *AM* Radio Service. Today, that Petition was sent to the Commission's Office of the Secretary, via Federal Express delivery to the Commission's Capitol Heights facility, *and* was also added to the record of FCC Docket 99-25 via Additional Written Comments by THE AMHERST ALLIANCE, THE MICHIGAN MUSIC IS WORLD CLASS! CAMPAIGN, THE LPAM NETWORK, Don Schellhardt, Esquire of Virginia and Nickolaus E. Leggett N3NL of Virginia.

Specifically:

Amherst learned, during the course of its demographic research for the Petition, that the U.S. Bureau of the Census (an arm of the U.S. Department of Commerce) has developed a *new* urban area classification: the *Micropolitan* Area. Traditionally, the Census Bureau has had two basic classifications: Metropolitan Statistical Areas (MSAs), which were sub-divided into Metropolitan Districts in a handful of cases (such as New York City and Los Angeles), and Everything Else. Now the "Everything Else" category has finally been sub-divided as well -- into rural areas and *Micropolitan* Areas.

A Micropolitan Area is, basically, a small but unified urban cluster -- such as Findlay, Ohio (with roughly 71,000 people) or Taos, New Mexico (with about 30,000) -- that "anchors" surrounding expanses of farmland and/or other rural territory. Micropolitan Areas, which are currently 560 in number, range in population from Torrington, Connecticut (with roughly 182,000 people) to Andrews, Texas (with around 13,000).

When the *combined* populations of MSAs *and* Micropolitan Areas are *both* subtracted from the total U.S.A. population, barely 40,000,000 people remain. This means that roughly 12% of the total U.S.A. population lives outside of both an MSA *and* a Micropolitan Area.

If LP250 eligibility is limited to Low Power Radio stations whose transmitters are located outside of both an MSA *and* a Micropolitan Area, then LP250 stations will be serving only the most rural *eighth* of the U.S.A. population. Thus, the development of the Micropolitan Area concept, and the Census Bureau's list of 560 such areas, makes it possible to "target" LP250 licenses more precisely than ever before.

This innovation by the Census Bureau addresses the thorniest conceptual problem that Amherst and others have faced in advocating LP250 stations for *truly* rural areas. We have been wrestling with the challenge of how to separate the *truly* rural areas from the other territory that falls outside of an MSA. Now, at last, this separation is possible.

THE AMHERST ALLIANCE commends this new tool to the Commission. We hope that the availability of Micropolitan Area data will encourage the Commission to license LP250 stations, on the FM Band, when the transmitters fall outside of both an MSA and a Micropolitan Area. We further urge the Commission to apply a similar approach once it begins to license Low Power Radio stations on the *AM* Band.

Respectfully submitted,

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